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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**STIPULATION AND [PROPOSED]
ORDER RE: REBUTTAL EXPERT
REPORTS**

Judge: Honorable Yvonne Gonzalez Rogers

1 Pursuant to Civil Local Rule 7-12, this joint stipulation is entered into between Plaintiffs and
2 Defendant Google LLC (“Google”, collectively the “Parties”).

3 WHEREAS, on April 15, 2022, Google served its opening expert report from Dr. On Amir
4 (“Amir Report”) which discussed the results of three surveys Dr. Amir conducted for purposes of
5 his report;

6 WHEREAS, on May 20, 2022, Plaintiffs served a rebuttal report to Dr. Amir from Mark
7 Keegan (“Keegan Rebuttal Report”) which provided (i) analysis of Dr. Amir’s studies and (ii) a new
8 study conducted by Mr. Keegan (the “Rebuttal Survey”);

9 WHEREAS, following a meet-and-confer, the Parties have agreed that, no later than June
10 30, 2022, Dr. Amir may serve a supplemental report (the “Amir Supplement”) that is (i) limited to
11 rebuttal of the Rebuttal Survey and (ii) does not contain a new survey;

12 WHEREAS, Google agrees not to object to the Rebuttal Survey on the grounds that it is
13 improper rebuttal under Federal Rule of Procedure 26;

14 WHEREAS, Google reserves its rights to challenge the Keegan Rebuttal Report on all other
15 potential grounds;

16 WHEREAS, Plaintiffs reserve its rights to challenge the Amir Supplement on all other
17 potential grounds;

18 NOW THEREFORE, IT IS HEREBY AGREED AND STIPULATED that Dr. Amir may
19 serve a supplemental report limited to rebuttal of the Rebuttal Survey no later than June 30, 2022.
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DATED: June 15, 2022

**QUINN EMANUEL URQUHART &
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/s/ Andrew H. Schapiro

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I am the ECF user whose ID and password are being used to file this “STIPULATION AND [PROPOSED] ORDER RE: REBUTTAL EXPERT REPORTS” and I hereby attest that each of the signatories identified above has concurred in the filing of this document.

/s/ Andrew H. Schapiro

Andrew H. Schapiro

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court here **ORDERS:**

Google may serve a supplemental expert report limited to rebuttal of Mark Keegan's Rebuttal Survey no later than June 30, 2022.

IT IS SO ORDERED.

Date: _____, 2022

Honorable Yvonne Gonzalez Rogers
United States District Judge